

Exhibit A to Joint Pretrial Order

**Zhang et al. v. Jenzabar, Inc. et al.**  
**Plaintiffs' Exhibit List (with objections)**

<b>No.</b>	<b>Description</b>	<b>Identifier</b>	<b>Objection</b>
1	Employment Agreement from Jenzabar to Zhang dated June 10, 2010	AGA 000010-11	No objection
2	Full-time Employment Agreement from Jenzabar to Zhang dated September 7, 2010 Agreement	AGA 000012-000013	No objection
3	Jenzabar Inc.'s Agreement to Protect Company's Assets signed by Jing Zhang	P000038-41	No objection
4	Jing Zhang's paystubs from Jenzabar Inc.	P000058-97	Object on grounds that this "exhibit" is actually several different documents/paystubs
5	Jing Zhang 2012 W-2 Form from Jenzabar Inc.		No objection
6	Jing Zhang 2011 W-2 Form from Jenzabar Inc.	P000042	No objection
7	Jenzabar Inc. Employment Application completed by Jing Zhang	P004412-14	FRE 106: Completeness
8	Jenzabar Inc. Employee Handbook	P000098-136	No objection
9	Jenzabar Inc. anti-harassment & discrimination policies	P004396-99	No objection
10	Handbook Acknowledgement Form signed by Jing Zhang	P004419	No objection
11	Benefit Forms signed by Jing Zhang	P000014-17	No objection
12	New York Annual Pay Notice from Jenzabar Inc. to Jing Zhang	P000044	No objection
13	March 2, 2012 proposal to Jing Zhang	AGA 00001-2	No objection
14	Proposed employment contract from Jing Zhang dated 3/2/2012	AGA 000387	No objection

No.	Description	Identifier	Objection
15	March 9, 2012 memorandum to Jing Zhang	AGA 000003-4	No objection
16	Jenzabar Foundation Inc. Articles of Organization	Exhibit 9 to Declaration of Kevin Mintzer in Support Plaintiff's Motion for Partial Summary Judgment dated June 27, 2014 ("Mintzer Declaration")	FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
17	AGA Articles of Organization	AGA 000016-23	No objection
18	AGA Amended and Restated By-Laws	AGA 000070-75	No objection
19	AGA 501(c)(3) submission dated 4/12/2011	AGA 000024-69	No objection
20	Jenzabar Foundation Inc.'s 2012 Annual report, on file with the Secretary of the Commonwealth, Corporation Divisions	Exhibit 11 to Mintzer Declaration	FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
21	Jenzabar Foundation Inc.'s 2011 Annual Report, on file with the Secretary of the Commonwealth, Corporation Divisions		FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
22	Jenzabar Foundation Inc.'s 2010 Annual Report, on file with the Secretary of the Commonwealth, Corporation Divisions		FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
23	Jenzabar Foundation Certificate of Change of Principal Office dated 4/12/2010		FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative

<b>No.</b>	<b>Description</b>	<b>Identifier</b>	<b>Objection</b>
24	Jenzabar Foundation Inc. 2010 IRS Form 990	P001298-1326	FRE 402: Relevance  FRE 403: Prejudicial/Confusing/Misleading/ Delay/Waste of Time/Cumulative
25	Jenzabar Foundation Inc. 2011 IRS Form 990	P001268-1297	FRE 402: Relevance  FRE 403: Prejudicial/Confusing/Misleading/ Delay/Waste of Time/Cumulative
26	Jenzabar Foundation Inc. 2012 IRS Form 990		FRE 402: Relevance  FRE 403: Prejudicial/Confusing/Misleading/ Delay/Waste of Time/Cumulative
27	Jenzabar Inc. 2015 Annual report, on file with the Secretary of the Commonwealth, Corporation Divisions		FRE 402: Relevance  FRE 403: Prejudicial/Confusing/Misleading/ Delay/Waste of Time/Cumulative
28	Jenzabar Inc. 2014 Annual report, on file with the Secretary of the Commonwealth, Corporation Divisions		FRE 402: Relevance  FRE 403: Prejudicial/Confusing/Misleading/ Delay/Waste of Time/Cumulative
29	Jenzabar Inc. 2013 Annual report, on file with the Secretary of the Commonwealth, Corporation Divisions		FRE 402: Relevance  FRE 403: Prejudicial/Confusing/Misleading/ Delay/Waste of Time/Cumulative
30	Jenzabar Inc. 2012 Annual report, on file with the Secretary of the Commonwealth, Corporation Divisions		FRE 402: Relevance  FRE 403: Prejudicial/Confusing/Misleading/ Delay/Waste of Time/Cumulative
31	Jenzabar Inc. 2011 Annual report, on file with the Secretary of the Commonwealth, Corporation Divisions		FRE 402: Relevance  FRE 403: Prejudicial/Confusing/Misleading/ Delay/Waste of Time/Cumulative

No.	Description	Identifier	Objection
32	Jenzabar Inc. 2010 Annual report, on file with the Secretary of the Commonwealth, Corporation Divisions		FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
33	AGA briefing on China's one child policy and recommendations for United States policy	P00669-677	No objection
34	All Girl's Allowed Resource Packet (dated 7/10/2010)	P000680-782	No objection
35	"Our Mission" statement from AGA's website from October 2010	Exhibit 5 to Ling Chai Deposition	No objection
36	Email by Ling Chai to Pat Barnett re offer letter to Jing Zhang dated 5/26/2010	P000001-2	No objection
37	Emails between Jennifer Long to Brian Lee dated 9/14/2010 with attached email from Long to Zhang dated 9/10/2010	AGA0004715-4716	No objection
38	Emails from Brian Lee to Ling Chai re Zhang Jing and full time with AGA dated 9/2/2010	AGA0002199	No objection
39	Emails between Brian Lee and Ling Chai re devotions and conversation with Jing Zhang dated 3/15/2011-3/17/2011	AGA0002614-2615	No objection

No.	Description	Identifier	Objection
40	Emails between Brian Lee and David Aikman and others between 3/1/2010 and 3/3/2012 re Seeking wisdom about personnel decisions	AGA0002822-2825	No objection
41	Letter from Daniel Alterman, Esq. to Robert Maginn, Jr. dated March 28, 2012 re Jing Zhang	P001352-1356	FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative FRE 408: Compromise Offer/Negotiations FRE 801, 802: Hearsay
42	All Girls Allowed supplemental IRS submission dated 4/23/2012	AGA000083-000143	No objection
43	Proposed Separation Agreement and benefits information provided to Zhang regarding her termination	P000157-000178	Object on grounds that this “exhibit” contains the same document repeated multiple times unnecessarily
44	Emails from Jing Zhang and Brian Lee regarding 2012 first quarter finance report dated 4/5/12-4/20/12	P000148-000151	No objection
45	Telephone conversation between Jing Zhang and Ling Chai, Brian Lee and Jing Zhang	Zhang audio file 1 and translation	Objection. Recording made in violation of Massachusetts (two party consent) law, where Ling Chai and Brian Lee were located during the call.  Also object to the accuracy of the translation.
46	Telephone conversation between Ling Chai, Brian Lee and Jing Zhang	Zhang audio file 2 and translation	Objection. Recording made in violation of Massachusetts (two party consent) law, where Ling Chai and Brian Lee were located during the call.  Also object to the accuracy of the translation.

No.	Description	Identifier	Objection
47	Telephone conversation between Ling Chai, Brian Lee, and Jing Zhang	Zhang audio file 3 and translation	Objection. Recording made in violation of Massachusetts (two party consent) law, where Ling Chai and Brian Lee were located during the call.  Also object to the accuracy of the translation.
48	Telephone conversation between Ling Chai, Brian Lee, and Jing Zhang	Zhang audio file 4 and translation	Objection. Recording made in violation of Massachusetts (two party consent) law, where Ling Chai and Brian Lee were located during the call.  Also object to the accuracy of the translation.
49	Letter from Bob Maginn dated January 20, 2011 concerning Jenzabar Foundation	AGA 0000715	FRE 402: Relevance  FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
50	Letter from Bob Maginn dated January 2011 concerning Jenzabar Foundation	AGA 000832-835	FRE 402: Relevance  FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
51	Email from Brian Lee to the Jing Zhang, Chai Ling, Yan Xu and others, dated 1/20/12 re Updates from China News	P 000253 – 000254	FRE 402: Relevance  FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
52	Email from Brian Lee to the Jing Zhang, Chai Ling, Yan Xu and others, dated 1/6/12 re Team Retreat Confirmed	P 000265-66	No objection
53	Email from Brian Lee to the Jing Zhang, Chai Ling, Yan Xu and others, dated 1/11/12 re Summary of 1/10	P 000293-000294	No objection
54	Emails between Christine Scanlon, John Beahm, Chai Ling and Brian Lee re Offer Letter, 6/10/12 to 7/26/12	AGA 0011102	No objection

<b>No.</b>	<b>Description</b>	<b>Identifier</b>	<b>Objection</b>
55	Emails between Brian Lee and Ling Chai on 3/12/2011-3/18/2011 re Summary of Friday March 18	AGA2589-2594	No objection
56	Email exchange between Brian Lee and Ling Chai on 3/18/2011 re Spiritual Phone Conversations	AGA0002595 – 2596	No objection
57	All Girls Allowed 2010 Annual report, on file with the Secretary of the Commonwealth, Corporation Divisions	Exhibit I to Declaration of Nicole Denver in Opposition to Defendants' motion for Summary Judgment ("Denver Declaration")	No objection
58	All Girls Allowed 2011 Annual report, on file with the Secretary of the Commonwealth, Corporation Divisions	Exhibit I to Denver Declaration	No objection
59	All Girls Allowed 2012 Annual report, on file with the Secretary of the Commonwealth, Corporation Divisions		No objection
60	All Girls Allowed 2013 Annual report, on file with the Secretary of the Commonwealth, Corporation Divisions		No objection
61	All Girls Allowed 2014 Annual report, on file with the Secretary of the Commonwealth, Corporation Divisions		No objection
62	All Girls Allowed 2015 Annual report, on file with the Secretary of the Commonwealth, Corporation Divisions		No objection

No.	Description	Identifier	Objection
63	All Girls Allowed 2016 Annual report, on file with the Secretary of the Commonwealth, Corporation Divisions		No objection
64	Chai Ling's LinkedIn biography	Exhibit 4 to Mintzer Declaration	FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
65	Defendants' Amended Answer, Affirmative Defenses and Counterclaim  (Along with applicable parts of Amended Complaint)		FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative FRE 801, 802: Hearsay
66	Defendants' Interrogatory Responses		FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative  Defendants also preserve and incorporate by reference all objections they made to Plaintiffs' Set of Interrogatories at the time they responded.
67	Zhang medical records produced by Yan Wang, M.D.	Wang001-064	No objection
68	Records from Dime Saving Bank Reflecting Payments from Jenzabar Foundation and Jenzabar Inc. to Women's Rights in China 2010-201	Appendix F to Report of Sam Rosenfarb	Object only on grounds that this "exhibit" is actually several different documents

No.	Description	Identifier	Objection
69	Notes of Jing Zhang of 2/17/2012 meeting	P001696-98	FRE 406: Completeness  Objection on the basis that the document is in Mandarin/Chinese and preserve all objections to introduction of this document as an exhibit on said grounds
70	Jing Zhang Damages Chart (to be provided)		Defendants preserve all objections because they are not familiar with the identifier and it thus appears Plaintiffs have not provided a copy of this heretofore unproduced document.
71	Women's Rights in China Damages Chart (to be provided)		Defendants preserve all objections because they are not familiar with the identifier and it thus appears Plaintiffs have not provided a copy of this heretofore unproduced document.
72	Email dated February 17, 2011 from Lee Brian to Chai Ling re – subject: summary for Thursday February 17, 2011	AGA 0002100-2101	No objection
73	Email from Brian Lee to various persons re Team Retreat on February 8-9? Dated 1/5/12	P00267-268	No objection
74	AGA annual report June 2010-June 2011	P000821-860	Objection – this exhibit is duplicative of exhibit 57
75	AGA Budget for 2010	AGA-0000534	No objection
76	AGA Briefing on China's One-Child Policy and Recommendations	P000669-677	Objection – this exhibit is duplicative of exhibit 33
77	Brian Lee 3/2/11 email to Chai Ling re: Summary of Weds., March 3	AGA-0002085-86	No objection
78	Brian Lee, Yan Xu emails 1.20.2012 re Rough Cut of Its a Girl	P000306-312	FRE 402: Relevance  FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative

No.	Description	Identifier	Objection
79	Email from Brian Lee 1/5/12 re AGA team retreat	P000267	Objection – this exhibit is duplicative of exhibit 73
80	Email from Brian Lee 2/16/2012 re credits question	P000331-332	FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
81	Email from Brian Lee to Jenzabar Payroll re Zhang vacation time 1/24/2012	P000406	No objection
82	Email from Chai Ling to Jing Zhang: re: Hello from Chai Ling: re Hello from Chai Ling, dated 6/6/09	P004375	Objection on the basis that the document is in Mandarin/Chinese and preserve all objections to introduction of this document as an exhibit on said grounds
83	Email from Chelsea Chase of Jenzabar re HR updated 4/13/2012	P000383-387	FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative FRE 801, 802: Hearsay
84	Email from Jennifer Long re 401k match, dated 2/16/12	P000395	FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative FRE 801, 802: Hearsay
85	Email from Jennifer Long to Jing Zhang dated 9/10/10 re Paperwork	P001785-86	No objection
86	Email from Jennifer Long to Jing Zhang dated 6/1/2010 re offer letter	P001788-1789	No objection
87	Email from Lee to Zhang 3/16/2011 re ???	AGA-0006202	No objection
88	Email from WRIC dated July 24, 2010 re [Chinese Characters]	P004426-4427	Objection on the basis that the document is in Mandarin/Chinese and preserve all objections to introduction of this document as an exhibit on said grounds

No.	Description	Identifier	Objection
89	Email from Zhang to Lee and Ling 3/30/12 re response to your letter	P000313-314	FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative FRE 408: Compromise Offer/Negotiations FRE 801, 802: Hearsay
90	Email from Yan Xu re Weekly China Report, dated March 21, 2012	P000252	No objection
91	Emails between Brian Lee, Yan Xu and others re New Material in dropbox	P000322-326	FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
92	Emails between Lee, Zhang and Xu re emailing answers to questions in English?	P000462-465	No objection
93	Emails between Yan Xu and Brian Lee re translation work 9/3/2010	P000409-411	No objection
94	Emails From Ling Chai, Lauren Bommhardt re Phone Message for AGA, dated 6/17/10	P000444-447	Objection on the basis that the document is in Mandarin/Chinese and preserve all objections to introduction of this document as an exhibit on said grounds
95	Emails with Chai Ling, Jing Zhang and Brian Lee re Numbers for Baby Shower Gift dated 11/1/10	AGA0014242-4245	Objection on the basis that the document is in Mandarin/Chinese and preserve all objections to introduction of this document as an exhibit on said grounds
96	Emails with Jing Zhang, Chai Ling and Jenzabar HR re: Offer Letter dated 5/28/2010	P001770-1784	FRE 408: Compromise Offer/Negotiations
97	Emails with Lee and Zhang and others re: Zhang Jing's bio dated 10/19/10	P000456-458	No objection

No.	Description	Identifier	Objection
98	Emails with Zhang, Ling, Beahm re payment to WRIC dated 6-9-10	P001804-1809	No objection
99	Jenzabar 401(k) distribution to Jing Zhang	P001811	No objection
100	Web Page from Jenzabar Inc. - Jenzabar – About Us –		No objection
101	Web Page from Jenzabar Inc. – Jenzabar - Leadership		No objection
102	Web Page from Jenzabar Inc. - The Jenzabar Foundation		FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
103	Web Page from the Jenzabar Foundation - our work -- affiliates		No objection
104	Email from Brian Lee to Zhang Re Zhang Jing and AGA proposal, dated 3/2/12	P000152	Objection on the basis that the document is in Mandarin/Chinese and preserve all objections to introduction of this document as an exhibit on said grounds
105	Minutes for All Girls Allowed first advisory board meeting dated 6/17/2012	P001362-1364	No objection (but date of document is 6/17/11, not 6/17/12)
106	Memorandum: Questions about Chinese Programs dated 4/6/2011	AGA0001365-1372	No objection
107	AGA Statement Regarding Media Inquiry	P000678-679	No objection
108	Web page from The Jenzabar Foundation: Who We Are		FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
109	WRIC Literature	P000956-995	FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative

No.	Description	Identifier	Objection
110	Email from Chai Ling to Zhang and others dated 7/16/10 re Asylum Packet and cover letter with attachments	AGA0011412-16	No objection
111	AGA Budget 2012	AGA700	No objection
112	Emails from Yan Xu, Brian Lee re: question dated 4/20/12	P001544-1548	Objection on the basis that the document is in Mandarin/Chinese and preserve all objections to introduction of this document as an exhibit on said grounds
113	Jenzabar Foundation Inc. 2013 IRS Form 990		FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
114	AGA 2014 IRS Form 990		FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
115	AGA 2013 IRS Form 990		FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
116	AGA 2012 IRS Form 990		No objection
117	Western Union Receipts	W001-W112	No objection
118	Photographs of WRIC Offices	Exhibits D, E, F & G to Deposition of Chishun Chang	FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative Object on grounds that this “exhibit” is actually several different documents
119	Photograph of Brian Lee, Jing Zhang and others in front of AGA/WRIC Offices		FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
120	Book Excerpt from “The Orphans of Shao” by Pang Jiaoming		FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative

No.	Description	Identifier	Objection
121	Jenzabar Foundation form 990 2010 Part III changes	AGA0000742-743	No objection
122	Intern Job Description – AGA and the Jenzabar Foundation	AGA00525	No objection
123	Email from Brian Lee to Tessa Dale re annual report, final dated 10/14/11 and attached report	AGA0009122-9162	No objection
124	Email from Brian Lee to Jing Zhang dated 1/2/12 re [Chinese characters]	P003003	Objection on the basis that the document is in Mandarin/Chinese and preserve all objections to introduction of this document as an exhibit on said grounds
125	Emails between Chai Ling and Jing Zhang re WRIC dated 5/25/10	P001397-1398	FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
126	WRIC Donation Confirmation Forms to Jenzabar Foundation	P001381-87	Object on grounds that this “exhibit” is actually several different documents
127	Emails between Isabelle Qinyi, Ling Chai, Jing Zhang and Brian Lee re Isabelle Political asylum dated 11/18/11	P001849-51	FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative  Objection on the basis that the document is in Mandarin/Chinese and preserve all objections to introduction of this document as an exhibit on said grounds
128	Emails between Jing Zhang and Ling Chai re “11-07-10-2011” dated 11/10/11	P002368	Objection on the basis that the document is in Mandarin/Chinese and preserve all objections to introduction of this document as an exhibit on said grounds
129	Linkedin Profile of Tara Craft Campell		FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
130	Linkedin Profile of Rebecca (Nelson) Olson		FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
131	Linkedin Profile of Annie Wang		FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/

No.	Description	Identifier	Objection
			Delay/Waste of Time/Cumulative
132	Jenzabar Summary of Benefits 2012	AGA 0009362-9366	FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
133	2012 Jenzabar Open Enrollment Newsletter	AGA 0009312-9319	FRE 402: Relevance FRE 403: Prejudicial/Confusing/Misleading/Delay/Waste of Time/Cumulative
134	Email from Brian Lee to Jing Zhang re Request for Baby Shower Pin Name in Pinyin dated 9/2/10	AGA 00013462	No objection
135	Email from Brian Lee to Jing Zhang re ??? dated 11/9/11	AGA 0009671	FRE 106: Completeness  Objection on the basis that the document is in Mandarin/Chinese and preserve all objections to introduction of this document as an exhibit on said grounds
136	Emails between Brian Lee and Jing Zhang re ??? dated 11/17/11	AGA 0009691	Objection on the basis that the document is in Mandarin/Chinese and preserve all objections to introduction of this document as an exhibit on said grounds
137	Email from Jing Zhang to Brian Lee and Chai Ling re Two Items Checkout dated 2/21/12	AGA 0002914	Objection on the basis that the document is in Mandarin/Chinese and preserve all objections to introduction of this document as an exhibit on said grounds